

Message

From: Lee, Bessie [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=CD1A2CF2F38F4D0DA561C44C58223465-BELEE]
Sent: 6/11/2014 4:09:09 PM
To: John Hamilton [john.hamilton@ihs.gov]
Subject: FW: Comments - HAMP Project Stakeholder's Meeting - Draft Water System Strategic Plan

From: Bessie Lee [mailto:Lee.Bessie@epamail.epa.gov]
Sent: Wednesday, June 11, 2014 8:17 AM
To: Lee, Bessie
Subject: Fw: Comments - HAMP Project Stakeholder's Meeting - Draft Water System Strategic Plan

~~~~~  
Bessie Lee  
~~~~~

U.S. Environmental Protection Agency, Region 9
Drinking Water Office (WTR-6)
75 Hawthorne Street
San Francisco, California 94105-3901
Phone: (415) 972-3776
Fax: (415) 947-3549
E-mail: lee.bessie@epa.gov

----- Forwarded by Bessie Lee/R9/USEPA/US on 06/11/2014 08:17 AM -----

From: "Hamilton, John (IHS/PHX)" <John.Hamilton@ihs.gov>
To: "Rea, Brad (IHS/PHX)" <Brad.Rea@ihs.gov>, "VanVleet, Joshua (IHS/PHX)" <joshua.vanvleet@ihs.gov>, "Felter, Marcus J (IHS/PHX)" <Marcus.Felter@ihs.gov>
Cc: 'Jay Charnholm' <JCharnholm@rcac.org>, "Matson, Eric (IHS/PHX)" <Eric.Matson@ihs.gov>, "Kerry Brough" <kerry.brough@ghd.com>, Bessie Lee/R9/USEPA/US@EPA, Lionel Puhuyesva <lpuhuyesva@hopi.nsn.us>, "Lorenz, Robert (IHS/PHX)" <Robert.Lorenz@ihs.gov>
Date: 09/07/2012 09:13 AM
Subject: Comments - HAMP Project Stakeholder's Meeting - Draft Water System Strategic Plan

Here are comments from First and Second Mesa stakeholder's and other participants at the HAMP Draft Water System Strategic Plan meeting:

Ivan Sydney	Water supply needs for Keams Canyon and the Jr/Sr High School should be considered in the future, as this area is considered part of First Mesa interests. BIA has no land lease for Keams Canyon. BIA wells are drilled in the Polacca area, without permission from local First Mesa leadership.
Lionel Puhuyesva	Current HAMP plans do not include service to the BIA water systems at Keams Canyon and the Jr/Sr High School, because these systems are owned and operated by BIA and the BIA has an obligation to serve people in these communities with safe water. EPA arsenic enforcement, AKA the Global Settlement, has resulted in the installation of an arsenic removal treatment plant for the Keams Canyon community. BIA has been informed by the Hopi Tribe of the potential to connect to the HAMP in the future, and the HAMP is designed with capacity to serve all three BIA Hopi water systems. Hopi WRP has told BIA to upgrade the Keams Canyon water system if they choose to connect to the HAMP.
Eric Matson	We understand BIA wants "out of the public water supply business".

Ivan Sydney	BIA has asked FMCV to take over the Keams Canyon (and Jr/Sr High School?) water systems, but FMCV asked that the water system(s) be upgraded first.
Royce Jenkins	Suggests that IHS provide copies of the PER and Strategic Plan, along with related maps and data to all villages for use in future grant applications. IHS has distributed drafts of these documents and said this would be done upon completion of the documents.
Kim Secakuku	The Plan doesn't mention the HAMP objective, which is providing water meeting the EPA arsenic drinking water standard. While the Plan mentions three villages, there are actually 6 villages and the community of Polacca, including Shungopavi, Mishongovi, Sipaulovi, Tewa, Walpi and Sichomovi.
Johnathan Lomakema	Will the HAMP result in a cost increase for villages and homeowners? The answer was yes, but existing operational costs for the water system will be reduced as wells are deactivated, and water sampling requirements decrease, labor related to wells will be eliminated from the villages.
Selwyn Sekaquaptewa	Recommends that each village get out of the water supply business, due to village liability for water quality testing.
Leslie Nasingoetewa	If existing village wells are deactivated, and physically disconnected from the water system, will they need to be water quality/compliance tested annually? No per EPA, if they are disconnected and not in service.
Kim Secakuku	The Plan states existing village wells will be "shut-off", but could a village use an existing well for fire suppression? Only if a separate system.
Eric Matson	Explained that EPA will not allow continuing use of existing wells, which are high in arsenic. Some existing water storage tanks may be taken out of service, although generally the HAMP is planned to supply water to the existing village water systems. The small 16,000 gal. tank and hydro-pneumatic tank at Upper Sipaulovi/Mishongovi may be an example of an existing tank that could be taken out of service.
Kim Secakuku	Would the existing water tank serving the Lower Sipaulovi/Mishongovi villages be taken out of service, as it is in need of repainting and repair? IHS has a project funded to repaint or replace this tank. It would remain in service.
Johnathan Lomakema	The old BIA tank in Lower Sipaulovi/Mishongovi is out of service and could be used as an emergency water tank, i.e. a water buffalo.
Kim Secakuku	The Plan budget for staff support and utility authority building construction and support seems low. We support VUMC as the HAMP operator, although they may need charter revisions? If the HAMP is operated by a newly formed tribal utility, we suggest the Tribe begin forming the organization now. Also an independent, separate utility would be better than a utility within tribal government, because many tribal hiring and business practices are incompatible. An independent board should oversee the utility.
Wallace Youvella	Advocates creating a tribal utility authority, because "no village utility is stable enough" to operate the HAMP.
Selwyn Sekaquaptewa	VUMC was established with a goal to be the utility for the tribe and villages. Each village has ownership of VUMC. Tribal politics would be removed from influence if VUMC operates the HAMP. Some of the VUMC bylaws will need to be revised and strengthened. VUMC could eventually take over village water systems, if requested by the villages and cost would be reduced due to economies of scale. Experienced people would be needed in key positions. Presently VUMC does not operate any village water system, but they serve as an equipment (and expertise) provider.
Kim Secakuku	If a tribal utility is formed to operate the HAMP, the tribe should provide funding to get it organized and to provide training of staff and board members.
Susan Secakuku	The HAMP PER and Strategic Plan have promoted good discussions within the Village of Sipaulovi. The village may want to have an option for takeover of water system operation by either the tribal utility authority or VUMC.
Wallace Youvella	First Mesa also may want to have either the tribal utility authority or VUMC takeover the water system operation.

Kim Secakuku	See Plan pdf page 64, are tribal development costs for the utility included in the budget? Answer, no since the operating budget considers only costs on or after 2015, not planning costs.
Eric Matson	The water system operating costs in the PER need to include both anticipated HAMP operating costs and village water distribution costs. The current Plan only includes the HAMP operating costs, so we'll need to estimate ongoing village costs and compare to existing water rates.
Sherwin Heaton	Confirms the PER needs the full water system operating costs, including both HAMP and village costs. This is important for the calculation of USDA Rural Development loan and grant amounts, as there is a maximum residential operating cost that impacts the loan amount.
Kim Secakuku	Mishongovi and Sipaulovi are two separate villages, so they need separate costs in the Plan and separate water meters to allow equitable cost sharing. At the present time, Upper Mishongovi residents are not paying for water supplied by Sipaulovi.
John Hamilton	Recommends a separate HAMP water meter also be planned for the Cultural Center, rather than having Shungopavi bill the Cultural Center for water.
Bessie Lee	The arsenic level at the Cultural Center is below 10 ppb, so is in compliance. We don't know if they want to be served by the HAMP.
Susan Secakuku	If BIA water systems are not connected to the HAMP in 2015, when operation is scheduled to begin, will that increase costs for the First and Second Mesa villages?
Kim Secakuku	See Plan pdf page 70, villages are not "institutions". Lower Sipaulovi/Mishongovi are OK as a combined distribution system, since Lower Mishongovi homes are metered and pay Sipaulovi for water.
Josh Van Vleet	Can separate water meters be installed for Upper Sipaulovi and Upper Mishongovi? Is distribution system piping compatible? He'll check the as-built drawings and work with the villages.
Kim Secakuku	Concerned that a village may not elect to participate in HAMP and then would need to pay capital cost fee later, if they decide to join.
John Hamilton	The capital cost allocation attributed to each of the three BIA water systems is a small fraction of the connection cost estimated by IHS, approved by the tribe and forwarded to BIA by Hopi Water Resources, which was several million dollars.
Susan Secakuku	The estimated HAMP operating costs are very useful to the villages, and we understand the villages need to consider "total costs", including both HAMP costs and village water system operating costs. For example, if the average HAMP monthly cost = \$26.18/month, the average total cost per house may be about \$41/month.
Kim Secakuku	See Plan pdf page 73, please add Upper Mishongovi to each of the cost tables in section 17. Sipaulovi community members are actively involved in community planning and development.
Kim Secakuku	Final discussion and decision for HAMP operations must involve the tribal council. Have they been involved to date? Yes, but primarily with respect to LCR integration. If LCR settlement had been approved, some of the HAMP pipeline would have been funded by the settlement.
Lionel Puhuyesva	If the LCR is approved and funded by the federal government, construction would not take place for many years and initial plans are to serve the Moenkopi community first. Arsenic needs to be addressed now!
Kim Secakuku	Village agrees tribe needs to be involved with project funding and seeking grants. The scale of grants needed to fund the \$18 million HAMP may take away competition for grants and have a negative impact on funds available to villages.
Wallace Youvella	Does the tribe have money to invest in the HAMP? The tribe seems to not use tribal resources, but instead requests federal funding of projects such as HAMP.
Sherwin Heaton	USDA will likely ask the tribe to contribute approximately 10% of the project cost.
Susan Secakuku	Is there a timeline for tribal involvement?

Sherwin Heaton	Suggests villages and Water Resources get together to talk to the tribal council for final support and approval.
Wallace Youvella	Is there a deadline for completion of the HAMP?
Bessie Lee	The compliance plans state the HAMP has been selected by the villages and that safe drinking water will be provided by Jan. 23, 2015.
Lionel Puhuyesva	It would be helpful to have letters of support from the villages, which we can take to the tribal council.
Kim Secakuku	Recommends Sipaulovi approve a resolution supporting the tribal arsenic lawsuit vs. BIA.
Susan Secakuku	Is there a timeline for the HAMP project through planning and construction?
Kim Secakuku	Change Plan to require financial audits of the utility authority or VUMC. Sipaulovi will provide written comments on the Plan.

John Hamilton, PE
EPA Engineering Consultant